

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

Joe Hunsinger
Plaintiff Pro-Se

v.

Civil Action No: 3-21CV2846-N

OFFER, LLC, and
MICHAEL SCHUTZE,
Defendants

**[PROPOSED] ORDER GRANTING DEFENDANTS' OFFER, LLC'S AND MICHAEL
SCHUTZE'S MOTION TO DECLARE PLAINTIFF A VEXATIOUS LITIGANT**

Before the Court is Defendants' Offer LLC's and Michael Schutze's Motion to Declare Plaintiff Joe Hunsinger a vexatious litigant. After taking into consideration the Motion, the attached supporting documents, the responses and pleadings thereto, and pleadings on file, the Court finds the Motion should be GRANTED.

The Court hereby makes the following findings of fact:

1. Plaintiff Joe Hunsinger has filed over fifty (50) lawsuits in the Northern District of Texas;
2. Plaintiff Joe Hunsinger has demonstrated no willingness to substantially engaged in the litigation process and it is apparent from the record that he routinely files lawsuits against businesses and either (a) settles them for sums below the cost of litigation and/or (b) dismisses them prior to engaging in the litigation process;
3. In the last year, Plaintiff Joe Hunsinger has filed over two dozen suits under the TCPA, making substantially the same allegations in each suit;

4. Plaintiff, in his pleadings, admits to utilizing a bait and switch tactic of answering a call a business makes to him, provides them his name, email, and contact information, and under false pretenses induces follow up communications from the business. He then files suit against the business for violations of the TCPA and attempts to use the legal system to extort settlements;
5. Plaintiff regularly fails to meet the legal pleading requirements necessary to prevail on a suit under the TCPA post *Facebook*; and
6. Plaintiff is engaged in a widespread practice of harassment against different people and businesses.

IT IS THEREFORE ORDERED that Plaintiff and his agents, servants, employees, attorneys, affiliated businesses, and those persons in active concert or participation with him are hereby permanently enjoined from filing any further cases in the Northern District of Texas against any party without leave of Court. This injunction shall become effective immediately.

IT IS FURTHER ORDERED that all fees incurred in this proceeding are to be assessed against Plaintiff. Defendants are directed to, within seven (7) days of this order, to submit a request for fees to the Court with sufficient evidence substantiating such fees.

Dated: _____

Judge Presiding